

EXHIBIT "A"**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Dallah Al Baraka Group and Al Baraka Investment and Development Corporation	<p>Dallah Al-Baraka Group LLC (DABG) was established by Saleh Abdullah Kamel in 1969 as a privately held business conglomerate.</p> <p>Kamel's personally held assets include Al Baraka Bancorp, Inc. in Chicago, Illinois; Al Baraka Bancorp, Inc. in California and Al Baraka Bancorp, Inc. in Houston, Texas. As early as 1984, Saleh Kamel held "sizeable investments in the United States ..." via his financial interests in DABG.</p> <p>In 1996, DABG owned more than \$230 million in assets in the United States and Europe. Albaraka Bancorp, Chicago held \$44 million in assets.</p> <p>DABG's financial arm is Al Baraka Investment & Development (ABID), a wholly owned subsidiary of DABG, based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, such as Al-Tawfeek Co. For Investment Funds Ltd (Cayman Islands), Egyptian-Saudi Finance Bank, Jordan Islamic Bank, and Al Baraka Bank Sudan.</p> <p>Kamel and ABID are also major shareholders, among other financial institutions, of the Arab Albanian Bank, and Faisal Islamic Bank-Egypt.</p> <p>ABID is also a shareholder of Faisal Islamic Bank Sudan. Al Baraka Bank Sudan also mentions in a 2002 presentation an investment in Faisal Islamic Bank Sudan. The list also includes defendants Al Shamal Islamic Bank and Tadamon Islamic Bank.</p> <p>Kamel has long been suspected by the U.S. of materially supporting transnational terrorist groups such as the Muslim Brotherhood and Al Qaeda. In fact, the U.S. has been investigating Kamel for his material support of al Qaeda along with numerous other defendants since the attacks on September 11th. Sealed indictments have been issued against several of these major material supporters</p>	1962(a) 1962(c) 1962(d)

	<p>of al Qaeda and the assets of other material sponsors have already been frozen by the [U.S.] Department of Treasury.</p> <p>Beginning in the late 1970s, Kamel financed and developed DABG and its subsidiaries to operate as profitable banking and investment institutions, and serve as financial vehicles for transferring millions of dollars to Islamic militants around the world.</p> <p>In 1977, Kamel helped found, and was an initial personal investor and director in, the Islamic Bank of Luxembourg (IBL). A historical document of the Muslim Brotherhood, the “Financial Strategy of the Muslim Brothers,” illustrates Kamel’s involvement early on in using financial institutions as a cover to secretly finance and facilitate the recruitment and training of Islamic militants. The document describes how Kamel and ABID used the IBL to establish a financial base for the Islamic militant movement:</p> <p style="padding-left: 40px;">“No doubt the economic side is important for any Dawa, since it has to own the economic foundation which makes available the financial resources which protects it from upheavals on the political front and in a way that makes it less dependent on individual charity payments. Also, this base offers a field for training human resources for the Gamaat [Muslim Brotherhood], in different economic and technical fields. On top of this, it will be easy to use the economic base as an umbrella which can not be easily penetrated through political activities.”</p> <p>The document states the Kamel/DABG is the largest shareholder in the bank among the Muslim Brothers with 25,000 shares.</p> <p>With the investment support of Kamel’s DABG via the ABID, the Muslim Brothers were able to become majority investors in the IBL in order to “be in a position to manipulate and manage it as a Gamaat [Muslim Brothers] Bank ...”</p> <p>Kamel and the Muslim Brothers enjoyed several benefits</p>	
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	<p>by becoming majority owners in the IBL:</p> <p>"keep secret money transactions since it is regarded as safe from security watch domains ... broadens the field of Islamic alternatives, in a practical framework for Islamic principles and the ideas of the Gamaat in the field of finance and economics ... is a good instrument to implement many projects which are necessary for the Gamaat and its members ... [and] it is a good instrument to train higher level economic, financial and technical staff, within the framework of the Gamaat plan. Moreover, expansion in the Bank's activities, shall lead to absorption of a great many specialized members of the Gamaat in its different departments."</p> <p>In 1982, Kamel and ABID began directing tens of millions of dollars in funds to at least 20 non-governmental organizations. One of those organizations was Osama Bin Laden's Mekhtab al- Khidemat (translation: "Office of Services," the predecessor to al Qaeda), which purportedly operated as a worldwide charitable organization and financing front for the Afghan mujahideen in their battle against the Soviets ending in the late 1980's.</p> <p>Kamel then continued his strategies and tactics for materially sponsoring the Islamic jihad (holy war) and jihadists, including al Qaeda. After the formation of al Qaeda in 1988, Osama Bin Laden's network initiated its notorious and well-publicized attacks against U.S. interests in the early 1990's.</p> <p>As early as 1993, Kamel made clear that the real underlying purpose of his global network of Islamic banks was to finance and materially support a violent holy war against non-Muslims throughout the world via these banking institutions located in 43 countries, including the U.S.</p> <p>During the 1993 closure of Dallah Al Baraka (UK) London by the Bank of England for illegal operations, Saleh Kamel stated:</p> <p>"We look at Albaraka International, in its</p>	
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	<p>capacity as the only Islamic bank in Europe, as a jihad, regardless of the low return to its shareholders. It is a foothold which Islam should not lose, but others look at as earthly profit only. We look at this issue differently and with no doubt that God will find us a way . . .”</p> <p>Through ABID, Kamel has been able to carry out this worldwide jihad by raising funds for and contributing to “charitable” jihadist front organizations worldwide. Kamel then exploits the prominent position these jihadist front organizations have in the international financial system by transferring funds from their local bank branches (including the ABID offices located in the United States) to terrorist operatives around the world.</p> <p>Defendants International Islamic Relief Organization (IIRO) and Sanabil Al-Khair (the endowment fund/financial arm of the IIRO) have long diverted their legitimate funds to support terrorism by soliciting donations in full-page advertisements in leading Islamic journals. These advertisements call for “Zakat” (Islamic almsgiving/charity) contributions to assist the needy in Chechnya, Bosnia, and other such areas and often provide account numbers to facilitate the contribution of funds. ABID account numbers appear in many of these advertisements, which ran throughout the 1990’s to the present in such publications as “Al-Igatha Journal” (the official IIRO publication) and the “Muslim World League Journal” (publication of the Muslim World League, IIRO’s parent organization). Both of these publications maintain a wide distribution throughout the United States.</p> <p>In 1992, Kamel contributed \$100,000 to Sanabil Al-Khair [IIRO] in the United States.</p> <p>Kamel established the ABID as a central financial clearing house for Islamic terrorism when al Qaeda first started carrying out attacks against the United States. An advertisement in the December 1993 issue of “Al-Igatha Journal” (the official IIRO publication) illustrates how Kamel has carried out his ongoing jihad. The advertisement states: “All donations are deposited into the organization’s joint accounts in all the branches of ... Al Baraka General Fund (G,K) and all the branches of Al Baraka Bank Group around the world.”</p>	
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	<p>The advertisement also states that with the financial assistance of ABID, the IIRO will distribute funds to “Somalia, Afghanistan, Kashmir . . . Palestine, Lebanon, the Philippines, Albania, and the former Yugoslavia.”</p> <p>The IIRO’s 1989 articles of incorporation list Kamel as a board member in their Washington, DC office. He is also listed as an incorporating board member alongside Ibrahim Mohammed Afandi, a fellow Golden Chain al Qaeda fundraiser.</p> <p>Sanabel al Khair, the North American financial arm of IIRO, was established to receive, invest, and generate funds for the operations of International Relief Organization (IRO)—the ‘United States arm’ of IIRO. Beginning in about 1991, IRO was operated out of an office at 360 S. Washington St. in Falls Church, Virginia by Dr. Sulaiman bin Ali Al-Ali.</p> <p>Sanabel al Khair/IIRO’s 1989 articles of incorporation list Saleh Kamel as a board member in their Washington, DC office. He is also listed as an incorporating board member alongside Ibrahim Mohammed Afandi, a fellow Golden Chain Al Qaeda fundraiser.</p> <p>Sanabel al Khair/IIRO has long diverted legitimate funds to support terrorism, soliciting donations through full-page advertisements run in leading Islamic journals. These advertisements calling for zakat contributions to assist the needy in Chechnya, Bosnia, and other such areas provided account numbers to facilitate the contribution of funds. These advertisements ran throughout the 1990’s and continue to run in such publications as <i>Al Igatha</i> and the <i>Muslim World League Journal</i> (publications distributed widely throughout the United States). Account numbers appears for Al Baraka Bank, a subsidiary of Dallah al Baraka, owned and controlled by Saleh Kamel.</p> <p>Golden Chain documents were uncovered in a March 2002 search of the Sarajevo offices of the al Qaeda front charity, “Benevolence International Foundation,” where authorities found several documents and items regarding the history of al Qaeda.</p>	
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	<p>A computer file labeled “Tareekh Osama” (translation: “Osama History”) containing scanned images of several documents, including a list known as the “Golden Chain.” According to the U.S. Government, this document lists “people referred to within Al Qaeda as the “Golden Chain of wealthy donors to mujahideen efforts.” Among the names listed was Saleh Abdullah Kamel.</p> <p>Support to Osama Bin Laden and al Qaeda operations in Sudan</p> <p>On September 26, 2001 U.S. Senator Carl Levin, Chairman of the Senate Armed Services Committee and the Permanent Subcommittee on Investigation of the Governmental Affairs Committee, stated that Al Shamal Islamic Bank (ASIB) operations continue and that there are indications that Osama Bin Laden is still shareholder of the bank through trustees and may still use the bank facilities.</p> <p>For more than two decades, Kamel and ABID have maintained major investments and held shares in a number of Sudan-based banks including [the aforementioned]ASIB, Sudanese Islamic Bank, Tadamon Islamic Bank, and National Development Bank in Sudan.</p> <p>Saleh Kamel and ABID were provided with numerous public notices regarding the Sudanese government’s support of the harboring of international terrorists.</p> <p>In April 1984, Al Shamal Islamic Bank (ASIB) issued shares to its main founders who included the Government of Northern State, Faisal Islamic Bank – Sudan and three individuals and entities representing Saleh Abdullah Kamel, including himself, his brother Omar Abdullah Kamel and ABID.</p> <p>As partners in an Islamic banking institution and its associates, co-conspirators or agents have a close and collaborative relationship that requires that the bank be aware of the project or business involved in the transactions, the source of its funding, and its goals, successes and failures. In other words, the Islamic financial institution’s relationship to its investment “customer” is akin to the relationship between Western business partners, and completely unlike the more arms-length Western banking relationship between customers</p>	
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	<p>and banks.</p> <p>The Chairman of ASIB (as of 2002) is Adel Baterjee, a wealthy Saudi Arabian businessman and founder of Defendant Benevolence International Foundation (BIF). As a close associate of Osama Bin Laden, Baterjee was selected by Bin Laden to collect funds on behalf of the al Qaeda network. Saudi Arabia closed the predecessor to the BIF in 1993 for its ties to terrorism. Additionally, the assets of the BIF have been frozen by the U.S. Department of Treasury on suspicion that the charity was secretly funding al Qaeda.</p> <p>Kamel and DABG continue to maintain joint investments, shares, finances, and correspondent bank accounts with ASIB even after it was widely known that the bank was materially supporting international terrorism and Osama Bin Laden and that Bin Laden was a major investor in the bank. Additionally, “Bin Ladin and wealthy National Islamic Front members capitalized ASIB in Khartoum. Bin Ladin invested \$50 million in the bank.”</p> <p>On March 30, 1992, Osama Bin Laden opened one of his ASIB accounts for Al-Hijrah for Construction and Development Ltd, a company the U.S. State Department says “works directly with Sudanese military officials to transport and provision terrorists training in [terrorist training camps in northern Sudan].”</p> <p>In 1993, Osama Bin Laden opened his second ASIB account in the name of his holding company, Wadi Al Aqiq, a company registered in Saudi Arabia. The import-export firm is said to have “in conjunction with his Taba Investment Company Ltd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members”.</p> <p>In the 2001 U.S. trial regarding the 1998 African embassy bombings, former Bin Laden associate, Jamal Ahmed Al-Fadl, testified that Osama Bin Laden and at least 6 al Qaeda operatives held ASIB accounts under their real names:</p> <p>“- While you were in the Sudan, did you</p>	
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	<p>handle money for Usama Bin Laden?</p> <ul style="list-style-type: none"> - Could you repeat the question. - Did you work on the finances for al Qaeda while you were in the Sudan? - Yes. - Did you know where the bank accounts of Usama Bin Laden and al Qaeda were? - Yes. - Do you know whose names they were in? - The bank account under Usama Bin Laden in Bank Shaml [Al Shamal Islamic Bank], Khartoum. - That was under Usama Bin Laden's true name? - Yes. - Were there accounts in other names? - Yes. Afad Makkee got account also. - Afad Makkee, the account that he had under his name, do you know what name that is? - I remember Madani Sidi al Tayyib. - Do you know of any other persons who had al Qaeda money in their accounts? - Abu Rida al Suri. - Do you know his true name? - Nidal. - ... Do you recall anyone else that had bank accounts in their name for al Qaeda? - Abdou al Mukhlafi.” <p>Al-Fadl also testified that al Qaeda operatives received monthly checks of several hundred dollars from ASIB accounts:</p> <p>“- When you worked for Usama Bin Laden, in the Sudan, how much were you paid?</p> <ul style="list-style-type: none"> - \$1,200 (...) per month. - For how long did you work for him? - Almost two years. - What banks did he keep his money at? - Bank el Shamar [Al Shamal Islamic Bank]. - Any other banks? - I think he had accounts in different banks, but I only recall Bank Shamar [Al Shamal Islamic Bank].” 	
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	<p>In addition, Al-Fadl testified that he transferred \$100,000 from ASIB to an al Qaeda representative in Jordan:</p> <p>“- How did you carry the \$100,000? - In my bag with my clothes. - Do you recall what kind of bills the \$100,000 was in? - I remember they all hundred bill. - Sorry? - They all hundred bill. - They were all hundred dollar bills? - Yes. - Who gave you the money? - Abu Fadhl, he bring it from Shamal Bank [Al Shamal Islamic Bank] and he bring it to me. - Abu Fadhl brought it from the Shamal Bank [Al Shamal Islamic Bank]? - Yes.”</p> <p>During the course of the same 2001 trial, Essam Al-Ridi (another associate of Bin Laden) testified that the bank was used for operational purposes. Al-Ridi testified that “\$250,000 was wired from ASIB” via Bank of New York to a Bank of America account held in Dallas, Texas – where he used it to “buy a plane delivered to bin Laden...intended to transport Stinger missiles....” in 1993:</p> <p>“- Can you tell us what Wadih El Hage [Chief financial assistant for Osama Bin Laden] told you when he first contacted you? - The interests of Usama Bin Laden in aquiring an airplane for Khartoum (...) They have some goods of their own they want to ship from Peshawar to Khartoum (...) Stinger missiles. - You testified on direct that the plane, that the purchase of the plane occurred in '93. Isn't it a fact that it began earlier, probably August '92? - Could be (...) - And during the course of that few months, money was wired into your account from the Sudan, correct?</p>	
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	<p>- Yes, that's correct.</p> <p>- And about \$250,000?</p> <p>- Yes.</p> <p>- And from the Shamal Bank [Al Shamal Islamic Bank] in the Sudan?</p> <p>- I can't recall the name.</p> <p>- I want to show you what has been marked as defendant El Hage A for identification, just ask you to read the first line of that.(...)</p> <p>- Does that refresh your recollection that the wire transfers came from the Shamal Bank [Al Shamal Islamic Bank] in the Sudan?</p> <p>- Yes, it does. (...)"</p>	
	<p>When Hassan al-Turabi took power in 1989, Sudan became an operational base for international Islamic terrorism groups.</p> <p>"Patterns of Global Terrorism" is a Congressionally-mandated report from the U.S. Department of State intended to provide a full and complete record for those countries and groups involved in international terrorism. This publication is updated annually by the Office of the Coordinator for Counterterrorism. The 1991 report stated the following:</p> <p style="padding-left: 40px;">"Terrorist and militant Moslem groups have increased their presence in Sudan. The government reportedly has allowed terrorist groups to train on its territory and has offered Sudan as a sanctuary to terrorist organizations . . The National Islamic Front, under the leadership of Hassan al-Turabi, has intensified its domination of the government of Sudanese President General Bashir and has been the main advocate of closer relations with radical groups and their sponsors."</p> <p>In 1991, Osama Bin Laden moved to the Sudan where he was welcomed by Turabi and the National Islamic Front (NIF). In fact, Turabi held a lavish reception in Bin Laden's honor upon his arrival. Turabi permitted and endorsed the creation of training camps by Osama bin Laden and other radical Islamic terrorist groups to</p>	

	<p>promote worldwide jihad. Turabi provided these camps and the greater al Qaeda network with military and logistical support through the government of Sudan.</p> <p>Beginning in 1991, bin Laden developed important building operations in Sudan in cooperation with the NIF and Turabi:</p> <p style="padding-left: 40px;">“[h]e [Osama Bin Laden] embarked on several business ventures in Sudan in 1990, which began to thrive following his move to Khartoum. Bin Laden also formed symbiotic business relationships with wealthy NIF members by undertaking civil infrastructure development projects on the regime’s behalf”.</p> <p>In 1991, Defendants Kamel, Yassin Al-Qadi and Prince Mohamed Al Faisal visited Sudan with other Saudi businessmen to examine Sudanese foreign investment opportunities. The event was hosted by the Sudanese government.</p> <p>Al-Qadi was named a “Specially Designated Global Terrorist” (SDGT) by the U.S. Secretary of the Treasury on October 12, 2001 pursuant to Executive Order 13224. Al-Qadi invested in ASIB and was instructed by the bank’s managers to transfer funds to the bank via ASIB’s correspondent account at Saleh Kamel’s Al Baraka Bank.</p> <p>This fact indicates that Kamel was using DABG as a vehicle/financial conduit for covertly directing funds/financial transfers to al Qaeda. Kamel would have major terrorist financiers such as Al-Qadi funnel monies through DABG to end-point financial institutions such as ASIB, which would then distribute funds to the Bin Laden network. Al-Qadi was also an investor in Kamel’s subsidiary company, Al-Tawfeek Company until 1997.</p> <p>Turabi’s activities in the Sudan were an endorsement of Kamel’s mission of worldwide jihad. In 1991, Turabi organized the Popular Arab and Islamic Congress (Al-Mutamar al-Arabi al’Shabi al-Islami, or “PAIC”). The PAIC, or General Assembly as it was called by its delegates, held its first meeting in Khartoum lasting three days, from April 25-28, 1991:</p>	
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	<p>“Islamists from the Middle East were, of course, well represented, but there were exotic members such as the Abu Sayyaf movement from the Philippines. Among their leaders was Muhammad Jamal Khalifa, brother-in-law of Osama bin Laden.”</p> <p>In 1992, Khalifa was the director of the IIRO in the Philippines when Kamel contributed at least \$100,000 to the organization through his U.S. ABID branch.</p> <p>Khalifa provided material support to Ramzi Youssef (convicted of the World Trade Center bombing in 1993) as Youssef prepared to assassinate Pope John Paul II during a trip to the Philippines in 1995; the Pope was never injured. Youssef was also planning, among other things, “Plan Bojinka,” a plot to simultaneously explode twelve U.S. flagship commercial airliners over the Pacific Ocean. In addition:</p> <p>“There were [also] numerous individual patrons of the conference, like-minded Saudis including Osama bin Laden who had recently begun to invest in the Sudan. During the deliberations of the conference Turabi presented a foreign policy initiative to the Sudan government based on an Islamist model of his own creation. He argued that Khartoum should serve as an outpost, a meeting place, and a training camp for Afghan-Arabs. Using the Sudan as a safe-haven they could spread the Islamist message to Afghanistan, Pakistan, Kashmir, and the former Soviet republics of Central Asia.”</p> <p>Turabi used the PAIC to bring together Islamic radicals from around the world who were actively participating in worldwide jihad. During this first meeting of the PAIC, al-Turabi led the attendees with chants of “Down with the U.S.A.” in English and “Death to the Jews” in Arabic.</p> <p>Turabi also preached co-Defendant Dar al Maal al Islami’s (translation: “House of Islamic Money”) message of jihad to various student groups. At the sixth Student Union Conference at the University of Khartoum, Turabi urged on Muslim youths throughout</p>	
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	<p>the world:</p> <p>“take up the challenge of uniting the Islamic countries [that] could never be achieved without jihad … the Islamic era will prevail, where truth defeats falsehood and all Moslems live in a united Islamic Nation.”</p> <p>In October 1994, Turabi opened and chaired the second Conference on Inter-Religious Dialogue in Khartoum with Dr. Ayman al-Zawahiri (al Qaeda’s second in command at the time) in attendance. At the conference, Turabi accused the West of trying to wipe-out Muslim independence. Attendees lashed out in “diatribes against tyranny, imperialism, the West and the United States – the ‘Great Satan.’”</p> <p>Turabi also praised the fatwa issued by Osama bin Laden from Afghanistan on August 23, 1996 entitled “Declaration of Jihad against Americans occupying the land of the Two Holy Mosques.”</p> <p>In 1998, Turabi sent a delegation to Saddam Hussein in Iraq to coordinate attacks on Americans:</p> <p>“Since America is an open society governed by weak liberals, he argued, it would be helpless against a sustained terrorist onslaught . . . To do this, he envisioned a terrorist attack like none before, striking at the very heart of the United States.”</p> <p>The United Kingdom has publicly reported at length the activities of Osama Bin Laden in Sudan, Somalia and Kenya during 1992-1993 which were materially supported by Kamel and DABG:</p> <p>“In 1992 and 1993 Mohamed Atef [Al Qaeda’s military chief] traveled to Somalia on several occasions for the purpose of organizing violence against United States and United Nations troops then stationed in Somalia. On each occasion he reported back to Usama Bin Laden, at his base in the Riyadh district of Khartoum.</p> <p>In the spring of 1993 Atef, Saif al Adel, another</p>	
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	<p>senior member of Al Qaida, and other members began to provide military training to Somali tribes for the purpose of fighting the United Nations forces.</p> <p>On 3 and 4 October 1993 operatives of Al Qaeda participated in the attack on US military personnel serving in Somalia as part of the operation 'Restore Hope.' Eighteen U.S. military personnel were killed in the attack.</p> <p>From 1993 members of Al Qaida began to live in Nairobi and set up businesses there ... They were regularly visited their by senior members of Al Qaida, in particular by Atef and Abu Ubaidah al Banshiri.</p> <p>Beginning in the latter part of 1993, members of Al Qaida in Kenya began to discuss the possibility of attacking the US Embassy in Nairobi in retaliation for US participation in Operation Restore Hope in Somalia. Ali Mohamed, a U.S. citizen and admitted member of Al Qaida, surveyed the U.S. Embassy as a possible target for a terrorist attack. He took photographs and made sketches, which he presented to Usama Bin Laden while Bin Laden was in Sudan.</p> <p>A Human Rights Watch report on Sudan mentioned that:</p> <p>In 1990-91 Turabi [also] established a regional umbrella for political Islamist militants, the PAIC, headquartered in Khartoum. It was formed with the immediate aim of opposing American involvement in the Gulf War. Turabi became its secretary general. Under his guidance, the Sudan government created an open-door policy for Arabs, including Turabi's Islamist associate Osama bin Laden, who made his base in Sudan in 1990-1996."</p> <p>By 1992, Sudan was sponsoring and harboring terrorists who were recruited, trained, and financed by Osama Bin Laden to carry out attacks on U.S. interests.</p>	
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	<p>Kamel/ABID supported Osama Bin Laden's Al Qaeda network by conducting business with Bin Laden entities and the government of Sudan. Kamel and ABID materially supported Osama Bin Laden and his al Qaeda network of front companies, farms, and factories in Sudan by entering into joint "symbiotic business" investments with Bin Laden entities.</p> <p>In a 1992 article describing Saleh Kamel and Al Baraka's investments in Sudan, Rashid Oomer, managing director of Al Baraka Finance stated: "[c]urrently, 60 percent of the Saudi imports of these seeds are sourced by us from Sudan," and that Saleh Kamel and Al Baraka were "exporting a variety of light engineering equipment such as lathes, transmission towers, etc." from Sudan.</p> <p>In January 1992, U.S. diplomats warned the government of Sudan to stop harbouring terrorists from the "radical Palestinian organization of Abu Nidal, the Iranian-backed Hizbollah Group, and allowing operatives to use the country as a "safe haven." An American official: "[t]his is a [terrorist] safe haven of choice. They can come and go as they please. They operate here with impunity." The official also stated that "if Sudan was a facilitator of these terrorist groups then the actions of the terrorist groups would be a responsibility of Sudan."</p> <p>In late 1992, Islamic extremists, who perpetrated the December 1992 attempted bombings against some 100 U.S. servicemen in Aden, Yemen told U.S. authorities that Bin Laden financed their group.</p> <p>In May 1993, a joint Egyptian-Saudi investigation disclosed that Bin Laden business interests helped funnel money to Egyptian extremists, who used the cash to buy unspecified equipment, printing presses, and weapons.</p> <p>In August 1993, it was widely reported in the English, Arabic, and Sudanese press that the U.S. placed Sudan on its list of state sponsors of terrorism for its support of Islamic fundamentalist terrorist entities.</p> <p>According to SDGT Yassin Al-Qadi, an ASIB shareholder and "social friend" of Kamel, Osama Bin Laden was allowed to maintain accounts as an investor in ASIB even though "[b]y February 1994 bin Laden had</p>	
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	<p>already been stripped of his Saudi nationality and was a well-known supporter of Islamic terrorist causes.”</p> <p>A 1996 U.S. State Department report entitled “Usama Bin Laden: Islamic Extremist Financier,” describes the likely economic collaboration of Kamel and DABG with Bin Laden:</p> <p>Bin Laden’s import-export firm Wadi al-Aqiq Company, Ltd, in conjunction with his Taha Investment Company, Ltd., secured a near monopoly over Sudan’s major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.</p> <p>In order to export substantial amounts of sesame products from Sudan to the Kingdom of Saudi Arabia, Kamel and DABG knew or should have known that they were likely dealing with businesses owned and operated by Osama Bin Laden.</p> <p>An Al Baraka annual report from the period shows Kamel and Al Baraka have “numerous major projects, such as the maintenance and operation of airports, [and] construction of roads” During this time, Osama Bin Laden was overseeing a number of major road and airport construction projects in Sudan and manufacturing light equipment in the country.</p> <p>This financial collaboration materially supported Osama Bin Laden’s al Qaeda terrorist network in its attacks against U.S. interests throughout the 1990’s, leading up to and including the al Qaeda attacks carried out on September 11th, 2001.</p> <p>Zakat</p> <p>Like all clients who bank with Islamic banks, a portion of Saleh Kamel’s investment revenues in Sudan were annually required to be committed to Zakat. Zakat calls for faithful Muslims to give a specified percentage of certain wealth to needy people. Cash funds held in possession for one year require a two and a half percent zakat payment, typically to a charity.</p> <p>On March 7, 1991, Turabi’s National Islamic Front</p>	
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	<p>ruling government instituted the Islamic Shariah (Islamic Law) Support Fund (ISSF) in accordance with presidential decree No. 239. The Fund's stated purpose:</p> <p style="padding-left: 40px;">...Aims in general at supporting the implementation of Shariah by deepening Islamic faith and practices spreading and encouraging holy war (Jihad)...The Fund has the following specific objectives: to support institutions, corporations and projects which aim at spreading Islamic belief...mobilization and training of the popular defense forces; and providing for martyrs' families.</p> <p>The ISSF jihad fund's largest public or private contributors were to (ASIB), which contributed 7 million Sudanese Pounds, and Tadamon Islamic Bank, which contributed 5 million Sudanese Pounds to support jihadist terrorist activities in Sudan and abroad. Saleh Kamel is a founding shareholder of and principal investor in ASIB, one of his primary Sudanese investments. ASIB reported in 2001 that Kamel held 15% of their shares.</p> <p>An August 1993 article in Sudanow (the Sudanese government's official publication) examining the use of corporate Zakat contributions in Sudan described how Zakat contributions "are diverted to finance jihad ... and to incentivize those who are employed to administer the funds."</p> <p>This August 1993 article was written just two months before the al Qaeda coordinated attack on American soldiers in Mogadishu, Somalia in October 1993 which killed 19 American troops. The attack was carried out by Arab veterans of the Afghanistan war (mujahideen) who trained for this attack in one of Bin Laden's terrorist training camps in Sudan.</p> <p>Osama Bin Laden was using these diverted Zakat funds, provided by Kamel and other major investors in the Sudanese economy, to train al Qaeda recruits and expand his network of jihadist fighters in preparation for attacks on U.S. targets.</p>	
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	<p>Saleh Kamel's investment portfolio includes a wholly owned subsidiary specializing in aviation services, Dallah Avco Trans-Arabia Co Ltd., formed in 1975 and based in Jeddah, Saudi Arabia.</p> <p>During 2001-2002, the FBI was silently investigating possible ties between Dallah Avco and the Al Qaeda network. Dallah Avco is currently being investigated by the U.S. State Department for their connection to Al Qaeda.</p> <p>Saudi national and Defendant Omar Al Bayoumi, who lived in the United States from the late 1990's until 2001, was Assistant to the Director of Finance for Dallah Avco.</p> <p>Nawaf al-Hazmi and Khalid al-Mihdhar, two of the hijackers of American Airlines Flight 77, had already, as of at least January 2000, been identified by United States intelligence as terrorist operatives, having been involved in providing logistical support for the near simultaneous bombings of the United States embassies in Kenya and Tanzania that killed 224 people and injured more than another 5,000 people.</p> <p>Omar Al-Bayoumi lived in the suburbs east of San Diego, California. According to Sen. Bob Graham, former Chairman of the Senate Intelligence Committee, al-Bayoumi served Saudi Arabia as a spy. Al-Bayoumi worked as an unpaid building manager in the Al-Madina al-Munawara mosque in the town of El Cajon, and received \$2,800 per month that he claimed came from relatives in India.</p> <p>During the last week of January 2000, Al-Bayoumi met the two terrorist hijackers, Nawaf al-Hazmi and Khalid al-Mihdhar, in Los Angeles.</p> <p>During the meeting, Al-Bayoumi offered to help Nawaf al-Hazmi and Khalid al-Mihdhar with their living arrangements in San Diego. Nawaf al-Hazmi and Khalid al-Mihdhar accepted the offer and relocated to San Diego.</p> <p>Al-Bayoumi then secured for Nawaf al-Hazmi and</p>	
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	<p>Khalid al-Mihdhar a six-month lease, for which al-Bayoumi paid the first two months (over \$1,500 total), on an apartment in the Parkwood complex, right across the street from the apartment that Al-Bayoumi had recently begun to occupy.</p> <p>Al-Bayoumi also served as a conduit for huge sums of money from the Kingdom of Saudi Arabia to the U.S. The Joint Congressional Committee final report released in July 2003 stated that Al-Bayoumi “had access to seemingly unlimited funding from Saudi Arabia.” In addition, he had an approximated \$2,800 per month income, plus monthly “allowances” of \$465 from a “ghost job” he held since 1993 with the Saudi aviation services company, Ercan, a subsidiary company of Dallah Avco Aviation, a Saudi government contractor owned by Saleh Kamel. Al-Bayoumi showed up for work at Ercan only once.</p> <p>The FBI found that Al-Bayoumi’s salary was approved by the father of another al Qaeda figure while working for the Saudi Aviation Authority.</p> <p>In February 2000, Al-Bayoumi began helping the two terrorist hijackers assimilate into their new lifestyle in San Diego. In March 2000, Al-Bayoumi’s monthly allowances from his Ercan job rose eight-fold from \$465 to \$3,700 per month, even though he only worked for them once (see above). The payments remained at that level until December 2000, when al-Hazmi left for Arizona. From March 2000 to December 2000, al-Bayoumi received nearly \$30,000 more than he ordinarily would have received for the “ghost job” that he never attended.</p> <p>Al-Bayoumi also had a steady stream of income through transfers from Majeda Ibrahim Ahmed al Dweikat, the wife of Osama Bassnan. Bassnan is a known al Qaeda sympathizer who “celebrated the heroes of September 11th” and talked about “what a wonderful and glorious day it had been.” Bassnan was suspected to be a Saudi spy being groomed to replace al-Bayoumi. Bassnan was deported from the United States after the September 11th attacks on visa violations and is likely living in Saudi Arabia.</p>	
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	<p>In April 1998, Bassnan solicited the help of Saudi Embassy because Al-Dweikat reportedly required thyroid surgery. At that time, Saudi Ambassador Prince Bandar bin Sultan wrote San Diego resident Osama Bassnan a \$15,000 check from a Saudi Embassy account at Riggs Bank which was reportedly supposed to be used for medical treatment for Al-Dweikat.</p> <p>Al-Dweikat then made a separate request to Princess Haifa al-Faisal, the youngest daughter of King Faisal (deceased), and Prince Bandar's wife. Prince Bandar then authorized payment of the first check of what was to become regular monthly installments of \$2,000 to \$3,000 to Al-Dweikat's bank account. The later payments came from Princess Haifa, in the form of cashier's checks, also from Riggs Bank, which payments continued until the summer of 2002 and totaled approximately \$130,000.</p> <p>In 2002, the FBI discovered that beginning in 2000, Al-Dweikat began signing her checks over to Manal Bajadr, Omar al-Bayoumi's wife. It is believed that al-Bayoumi then forwarded this money on to the September 11th hijackers. This conclusion supports Bassnan's boast to the FBI that he had done more for the two terrorist hijackers than Al-Bayoumi.</p> <p>Support to Al Haramain Foundation</p> <p>The Russian Federal Security Bureau (FSB) has publicly reported that Saleh Kamel and Al Baraka Bank were used by the Saudi Al-Haramain Charitable Foundation to funnel money to Islamic resistance fighters in Chechnya.</p> <p>The Saudi Al Haramain Islamic Foundation was listed as a Specially Designated Terrorist by the Office of Foreign Assets Control (OFAC) of the Department of the Treasury and its assets have been blocked pursuant to Executive Order 13224 of September 9, 2004. Its offices in Bosnia Herzegovina and Somalia were added to the terrorist list on March 12, 2002.</p> <p>A memo from the FSB details the bank's role in funding Al Haramain:</p> <p style="padding-left: 40px;">Al Haramein [Haramain] created a foundation in support to Chechen, whose branch at the end of 1999 was opened in Azerbaijan and it uses the</p>	
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	<p>services Albaraka Bank. Funds were directed into the near-boundary with the Chechen republic region of the operators, which is occupied by the rebel forces. Despite the fact that the official financing is dedicated to religious use for conducting of Moslem holidays, actually they are consumed on the needs of Chechen NVF. On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef. The families of those have settled in the United Arab Emirates and other neighboring countries in the Middle East”.</p> <p>The FSB intercepted messages from the Al-Haramain – Saudi Arabia to its envoys in Chechnya. One of the intercepted messages described the operations which Saleh Kamel and Al Baraka were supporting:</p> <p>“The load is ready for sending -- grenade launchers with ammunition, bullets for various systems, machine-guns, Kalashnikov submachine-guns, sniper rifles. One thousand rounds of ammunition, automatic grenade launchers, a Fagot anti-tank missile and 500 (bullet- proof) vests have been bought.”</p> <p>Oleg Syromolotov, Deputy Director of counterintelligence at the Russian FSB, stated during an interview that “The Saudi Arabian Al-Haramayn . . . was funding gunmen and organizing arms supplies to and the recruitment of foreign mercenaries to fight in Chechnya on the pretext of giving charitable aid.”</p> <p>Another Russian intelligence memo on Al-Haramain, compiled by the Russian Counter-Terrorism Center (CTC) illustrates the extent of the financial backing provided by the Al Baraka Bank network:</p> <p>“Through one of its branch offices, the Al-Haramain transferred large amounts of money to the local Wahhabi center in Dagestan, known as the Islamic center “Kavkaz,” in the capital of the republic, Makhachkala, and in the village of</p>	
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	<p>Karamakhi in Buinaksk in the Republic of Dagestan. The Al-Haramain set up a new fund in support of Chechnya, known as the Foundation Regarding Chechnya, which used the services of the Al-Barakaat Bank.”</p> <p>Another Russian intelligence regarding the international financial structures funding Chechen rebels, entitled “Reference Information on Funding of Abroad-Stationed Chechen Separatists,” states:</p> <p><u>In Saudi Arabia</u> – (...) From Saudi Arabia, moneys are remitted to Chechen separatists through the Lebanese banks of ‘Al Baraka Bank Lebanon’ and ‘Al-Takwa,’ which, through their respective affiliations, remitted the total of \$10 million US Dollars to Europe.</p> <p><u>In Great Britain</u> - the ‘Al-Barakah’ bank, which is incorporated in Dalian [Dallah] Al Barakah group, controlled by the industrial corporation of Saleh Al Kamel.”</p> <p>In its annual report on Human Rights Practices for 2001, the U.S. State Department reported the connection between Al-Qaida terrorist organization and Chechen rebel leader Al-Khattab, appointed by Osama Bin Laden:</p> <p>“The international terrorist leader Usama Bin Laden reportedly sent funds, personnel, and material to elements in the rebel camp. A number of the rebels are not ethnic Chechens and are from foreign countries. According to press reports, as many as 400 of Bin Laden’s followers may have joined the rebels from his base in Afghanistan. . . One rebel field commander, Ibn-ul-Khattab, is Saudi-born and reportedly was trained in Afghanistan by Usama Bin Laden. In October presidential spokesman Sergey Yastrzhembskiy claimed that there were approximately 200 non-Chechen fighters in Chechnya.”</p> <p>The White House spokesman Ari Fleischer confirmed those links during a press conference on September 26, 2001:</p>	
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	<p>“There is no question that there is an international terrorist presence in Chechnya that has links to Osama Bin Laden. . . That also is a point of view that was shared with the Senate Foreign Relations Committee in, I believe, it was November of 1999 by a spokesman, an official from the Clinton State Department when he testified before Senate Foreign Relations. So that's been long been known; in fact, it's been referenced in the Pattern of Global Terrorism Report, which was issued by the State Department.”</p> <p>The use of Al Baraka Bank by Al Qaeda operatives and associates in Chechnya was confirmed by a statement from Al-Haramain chairman, SDGT Aqil al Aqil, who declared that the charity maintained accounts at Al Baraka bank in Saudi Arabia.</p> <p>In fact, Al Haramain directed almost \$50 million from Arab donors to the Chechen mujahideen which was routed through offices of [the bank] Albaraka in several Middle Eastern countries.</p> <p>In order to simplify the transfer of funds between Middle Eastern donor sources and Chechen-Arab terrorist elements, Al Baraka operated banks in Chechnya during the mid-to-late 1990s when al Qaeda affiliated leaders were in command of the Chechen military and portions of the government.</p> <p>Saleh Kamel/DABG also consulted the Chechen government on establishing a Shariah-compliant economy, sponsoring Chechen specialists to go to the U.S. to study Shariah-compliant Islamic finance.</p> <p>In reality, Saleh Kamel/DABG was just expanding their global jihadist banking network. Kamel set-up operations in a locality where al Qaeda was known to operate, then directed millions of dollars in illicit funding from the Middle East for the jihad against Russian and foreign civilian targets – including Americans.</p> <p>While a “part of the money was spent on charity, the rest ended up in the hands of Khattab’s closest associates and</p>	
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	<p>in his personal bank account."</p> <p>Al Haramain operations in Chechnya started in 1994, with the creation of a foundation chapter:</p> <p>"The Foundation has begun activities in the Caucasus since 1414 [1994] Hijri with a "feeding the fasters" project in Dagestan, Tatarstan and Russia. Likewise it has given summer courses in Islam, sponsored du'aat (Islamic propagators). At the start of the crisis in Chechnya the opening of an office in Azerbaijan was completed in order to finish sending hundreds of tons of aid in the form of foodstuffs, clothing and blankets. Additionally, support of refugees and immigrants to neighbouring countries was undertaken."</p> <p>Al Haramain action in Chechnya takes the form of a direct ideological and material support to Arab jihadist fighters:</p> <p>"Allah! Aid our Mujahideen brothers in Chechnya. O Allah! Unify their rows, and gather them on the word of truth . . . Defeat Russia! O All Mighty! O All Powerful! O Allah Indeed we ask that You Scatter their firing, and Shake the earth beneath their feet, and Strike fear in their hearts. O Allah! Cripple their limbs and Blind their sight, and send upon them an epidemic and calamities. O Allah! Separate their gatherings and Scatter their unity, and make their condition severe amongst themselves, and make their plots go against them, and show us in them the amazements of your Power, and make them a lesson for those who do not learn lessons. O Allah! Hurry their destruction, and make their wealth as booty for the Muslims."</p> <p>In 1998, Saleh Kamel's Al-Baraka Bank in Turkey transferred 1,059,687 Deutsche Marks (DEM) from an Al Haramain account at Al Baraka account in Turkey to the Deposit Bank (<i>Depozitnaya Banka</i>) in Sarajevo, Bosnia-Herzegovina where Al Haramain also maintained an account. Of this amount, 300,000 DEM disappeared from Al Haramain accounts.</p>	
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	<p>Iqraa International Foundation</p> <p>Iqraa International (aka Iqraa Charitable Society, aka Ikraa International, aka Ikraa Society, aka Iqra Association) is a Saudi-based charitable organization founded in 1983 by Saleh Abdullah Kamel and managed by Mohammed Abed al-Yamani. The Iqraa Foundation maintains an office in Skokie, Illinois outside of Chicago.</p> <p>The branch is located at 7450 Skokie Blvd, Skokie, IL 60077-3374. The US branch reported revenues of \$1.2 million for fiscal year 2002.</p> <p>The Iqraa Foundation IRS 990 form for 1997 shows that the organization received a loan from Burnett Defendant SAAR Foundation for an amount of \$10,000.</p> <p>Iqraa International is currently under Russian FSB investigation for terrorism financing and material support of Chechen and al Qaeda terrorism in the Caucasus.</p> <p>The activities of Iqraa International in Russia were coordinated by Servakh Abid Saad, an Egyptian national who acted on behalf of Saudi Intelligence according to a recent official Russian study. Abid Saad is the director of the Russian office of Iqraa international charity organization and was involved in reconnaissance activities for Iqraa Foundation headquarters in Jeddah and the Embassy of Saudi Arabia in Moscow. Servakh Abid Saad also had regular contacts with top al-Qaeda officers.</p> <p>Russian law enforcement agencies have added Abid Saad to their terrorism wanted List. The head of the public relations centre of the Dagestan branch of the Russian FSB security service, Murad Khadzhimuradov, told <i>Itar-Tas</i>, on April 2, 2001, that a criminal case was opened against Servakh Abid Saad under Article 208 of the Russian Criminal Code. The official stated that the Russian government was in possession of documents proving that Chechen-Arab extremists, including Khattab, Basayev, and Barayev, received financial and material assistance from some prominent political and financial leaders in Saudi Arabia through Iqraa International.</p>	
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	<p>Iqraa International's Chairman and director is Mohammed Abed al-Yamani (aka Muhammad Abdo Yamani).</p> <p>Al-Yamani is one of Saleh Kamel's closest business and political partners. Mohammed Abed al-Yamani, is currently deputy President of DABG. He began his career as manager of the board of Kamel's DABG and later became an executive board member of DABG before entering his current position.</p> <p>In 1992, in his capacity as Vice-Chairman the Higher Committee for Collecting Donations for Muslims of Bosnia-Herzegovina, he received \$4,266,723 from Defendants Kamel and Bakr Bin Laden. The Muslim World League and its main branch the IIRO were participating in this fundraising drive.</p> <p>Dr. Muhammad Abdo Yamani, is also chairman of the IIRO investment committee and has participated since 1981 in financing the fundamentalist "Islamic alliance...."</p> <p>Iqraa International carries out operations in several countries, e.g. India, Bosnia, and Chechnya. Iqraa's financial activities are managed by the Iqra Trust in the UK (24 Culross Street, London, UK). The Trust was founded in 1988 for the purpose of providing services and resources to Muslim prisoners. In 2001, it reported an income of £660,000.</p> <p>Members of the Board of Iqraa International Educational Foundation in the U.S. include Dr. Abdullah Omar Nassief, former Secretary General of Defendant Muslim World League, and the Shura Council of the Kingdom of Saudi Arabia.</p> <p>Iqraa also developed its activities in India through the Iqraa International Hospital and Research Centre (IIHRC), jointly financed at a cost of \$5 million by DABG and Iqraa International. The Iqraa Charitable Society financial operations are frequently jointly operated along with DABG.</p> <p>In 2004, twelve individuals associated with a mosque</p>	
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	<p>operated by Saleh Kamel's Iqraa Foundation were arrested in Levallois-Perret, France, a suburb of Paris. A cache of weapons and jihadist literature was seized.</p> <p>Support provided to Spanish al Qaeda cell</p> <p>Kamel/DABG also provided material support to the Spanish Al Qaeda cell which directly funded and helped coordinate the September 11th hijacker cell. Muhammed Galeb Kalaje Zouaydi, financial head of the cell, used Al Baraka Bank Finance House in Turkey to transfer money to Mohamed Bahaiah, aka Abu Khaled, courier of Usama bin Laden in Europe, and brother-in-law of Zouaydi .</p> <p>Spanish authorities obtained documents regarding bank transfers in the amount of \$3,000 between Zouaydi and Fawaz Zakri, another alleged member of al-Qaeda network in Istanbul. The bank transfer was carried out through Al Baraka Turk Finance House . The head of the Spanish cell, "Imad" Eddin Barakat Yarkas, was the final recipient of this financial transaction, according to Spanish officials.</p> <p>Involvement in Bank Al-Taqwa</p> <p>In 1995, it was reported that Saleh Kamel and Al Baraka Bank had "major investments" in Bank Al-Taqwa, the Bahamas-based specially designated global terrorist entity.</p> <p>Saleh Abdullah Kamel and Al Baraka Bank were initial shareholders of the International Islamic Bank, predecessor to Bank Al-Taqwa, affiliated with the Muslim Brotherhood. Al Taqwa was designated SDGT by the US government on November 7, 2001, for being a "financier of terror" that "provides cash transfer mechanisms for Al Qaida".</p> <p>In 2002, US Treasury Secretary Paul O'Neill stated in a U.S. Treasury Department report the following regarding Al Taqwa:</p> <p style="padding-left: 40px;">"As of October 2000, Bank Al Taqwa appeared to be providing a clandestine line of credit to a close associate of Usama bin Laden and as of late September 2001, Usama bin Laden and his Al Qaida organization received financial assistance from Youssef M. Nada [director of</p>	
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	<p>the bank].”</p> <p>The same document mentions Saleh Abdullah Kamel as being a member of the board of directors of the bank.</p> <p>The co-director of Bank Al-Taqwa, Specially Designated Global Terrorist, Youssef Nada, who has been a senior leader of the Muslim Brotherhood terrorist movement for decades and principal financier of Al Qaeda, has explicitly acknowledged that “I manage [Bank Al-Taqwa] portfolios myself.”</p> <p>Saleh Abdullah Kamel also appears in a phone book seized during searches of Al Taqwa director Youssef Nada’s house in December 1999. His name is followed by a phone number in Cannes, France as “Kamel Saleh Sheikh, Cannes, 0033936/19607.”</p> <p>Youssef Nada acknowledges that Bank Al-Taqwa was publicly under investigation for financing terrorism as early as 1995.</p> <p>Q: A report of the United States Treasury Department, published in 1999, mentioned that fund transfer companies compose a sanctuary for terrorist and criminal bodies, those companies have been used to support terrorism. Do you think that...</p> <p>...</p> <p>A: Well, I cannot exclude that because we started facing the problems publicly from 95, they were escalated in 97 and reached the peak in this final situation in 2000-2001.</p> <p>In 1997, while Saleh Kamel maintained investments at Bank Al-Taqwa, <i>Agence France Presse</i> and the U.S. Department of Treasury reported that terrorist fundraisers were annually transferring \$60 million for the Hamas terrorist group through Bank Al-Taqwa accounts. Furthermore, the Treasury Department report mentioned that Bank Al-Taqwa appeared to be providing a clandestine line of credit to a close associate of Osama bin Laden.</p> <p>Thus, as early as 1995, Saleh Kamel knew or should have known that Bank Al-Taqwa was under investigation</p>	
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	<p>for financing terrorism and that his finances were very possibly being diverted to terrorist entities.</p> <p>As an Islamic banking institution, Bank Al-Taqwa required its investors to comply with its “own obligations of <i>zakat</i>. The bank managers and directors would then take these “give [these] funds to fundamentalist groups.”</p> <p>Bank Al-Taqwa diverted funds from investors’ accounts to terrorist entities— but only after the investor authorized the <i>zakat</i> funds to be withdrawn from the investment accounts in compliance with <i>shariah</i>.</p> <p>Thus, Saleh Kamel would have been required to authorize the <i>zakat</i> withdrawal from his <i>mudarabah</i> investment account with the knowledge that these funds could have been used for the material support of terrorism.</p> <p>On November 7, 2001, Bank Al-Taqwa, its affiliated business and key executives were designated as financial supporters of Osama bin Laden and al Qaeda by President George W. Bush. In announcing the designation of Bank Al-Taqwa as a global terrorist entity, President Bush stated:</p> <p style="padding-left: 40px;">“Al Taqwa is an association of offshore banks and financial management firms that have helped al Qaeda shift money around the world. Bank-Al Taqwa raises money for Al Qaeda. They manage, invest, and distribute those funds...They present themselves as legitimate businesses, but they skim money from every transaction for the benefit of terrorist organizations.”</p> <p>Al Baraka Shariah Board</p> <p>The brothers Maulana Mohammed Rafi Usmani and Maulana Justice Mohammed Taqi Usmani are well-known Islamic clerics in Pakistan who direct the Jami Darul Ulum Madrassa in Karachi, Pakistan.</p> <p>Both brothers have, at various times, served on the Shariah Compliance Board of DABG. Darul Ulum has certified Al Baraka Bank as a “true Islamic bank.”</p>	
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	<p>The Darul Ulum Madrassa “backs jehadi organizations and both the Usmani brothers have provided practical help in setting jehadi organizations and delegates of these organizations have permission to preach and collect donations from mosques and branches of the madrassa.”</p> <p>Darul Ulum provides support to Al Qaeda affiliates and specially designated global terrorist entities Harkatul Mujahideen, Jaish-e-Mohammed and Jamiatul Mujahideen.</p> <p>Both Rafi and Taqi Usmani were signatories to a fatwa in late 2001 which supported the Taliban and Al Qaeda in their war against the United States:</p> <p>“The Pakistani President admitted in a recent press conference that there are some suspicions that link Usama Bin Laden to the 11 September incident, which simply means that whatever evidence was produced is nothing more than conjecture. The burning question is which judicial system in the world allows the punishment of an accused and in fact the entire population of a country, merely on the basis of speculation? ... The U.S. will ultimately live to regret the outcome of its tyrannical short-sightedness ... At this time its imperative upon every Muslim to support this JIHAD in Afghanistan in whichever way it is possible without any reservation.”</p> <p>Maulana Justice Mohammed Taqi Usmani is the Chairman of the Dow Jones Islamic Investment Index Fund based in the United States.</p> <p>Support to Hamas organization</p> <p>Al Aqsa Islamic Bank (“Al-Aqsa”) was founded in 1998 in the West Bank town of Al-Beireh by several financial groups and Arab investors with \$20 million in capital. Its main shareholders were Kamel/DABG, and a DABG subsidiary, Jordan Islamic Bank (JIB).</p> <p>According to Al-Aqsa’s acting general manager, Mohammed Sarsour, JIB owns 14 percent of Al-Aqsa. Kamel has acknowledged that he owns another 12 percent through his privately owned conglomerate</p>	
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	<p>DABG.</p> <p>Since 1998, Israel has refused to approve the licensing of the bank, citing its financial ties to Hamas. At the beginning of 2001, several Israeli antiterrorism authorities visited Citibank's headquarters in New York—Al Aqsa's correspondent in the United States—to warn its directors about the nature of the bank's activities.</p> <p>According to the Israelis, financial support for Hamas originated from the U.S.-based Muslim charity “Holy Land Foundation for Relief and Development,” whose assets were frozen by the U.S. government in December 2001.</p> <p>Assets of Al Aqsa Islamic Bank and of two shareholders were frozen in December 2001 by the United States pursuant to Executive Order 13224. The bank is described as the “financial branch of Hamas.”</p> <p>According to the Department of the Treasury statement:</p> <p style="padding-left: 40px;">“Al-Aqsa Islamic Bank, with locations in the West Bank and Gaza Strip, is a financial arm of Hamas. Al Aqsa is 20% owned by Beit el-Mal, and the two share senior officers and directors. In addition, a majority of its shareholders and senior officials have ties to Hamas. Individuals associated with the Bank have been previously arrested and charged with financing Hamas activities in the Middle East. Soon after the bank opened in 1998 its connection to Hamas extremists became evident and a number of banks refused to clear its transactions.”</p> <p>U.S. Contacts</p> <p>In June 2004, representatives of DABG visited Washington and New York to discuss development of the Iraqi financial sector with U.S. government officials.</p> <p>In 1999, it was announced that Kamel and DABG were 25 percent minority shareholders in FLAG Telecom, which was licensed to build a “dual transoceanic cable system” between New York City and a number of European capitals. The project was scheduled to be</p>	
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	<p>completed in the “second half of 2000.”</p> <p>Kamel and DABG sponsored the Third Harvard University Forum on Islamic Finance’ at Cambridge, Massachusetts in October 1999.</p> <p>Al Baraka’s wholly-owned sporting goods subsidiary, Eurovictory Sports, USA, imports footwear from Europe into the United States.</p> <p>In July 2003, Kamel/DABG announced that it would sue four unnamed Western banks as third party defendants if Kamel and Al Baraka were not dismissed from the Burnett v. Al Baraka lawsuit. Kamel stated “the banks had provided services to the alleged terrorists or their assistants,” making them liable under the aggressive legal strategy of the Burnett lawyers.</p> <p>Kamel and DABG are defendants in the civil suit, <i>Skidmore Energy, Inc. v. KPMG, et al.</i>, in United States District Court for the Northern District of Texas, for their alleged involvement in a conspiracy scheme to defraud a Texas oil company from investment funds and exploration rights in a Moroccan oil field.</p> <p>Saleh Kamel/ABID knew or should have known that he was materially supporting terrorism based on events and widely circulated news coverage regarding the terrorist activities of Osama Bin Laden’s network and the Sudanese government.</p>	
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